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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

ABBEY DENTAL CENTER, INC.,  
 a Nevada Corporation,

Plaintiff,

v.

CONSUMER OPINION LLC, a Nevada  
 Limited liability company; DOES 1-10; and  
 ROE ENTITIES 1-10, inclusive,

Defendants.

Case No.: 2:15-cv-02069-GMN-PAL

**STIPULATION AND (PROPOSED)  
 ORDER TO EXTEND TIME FOR  
 PLAINTIFF TO RESPOND TO  
 DEFENDANT’S SECOND SPECIAL  
 MOTION TO DISMISS FIRST AMENDED  
 COMPLAINT PURSUANT TO NRS 41.660  
 AND MOTION FOR SUMMARY  
 JUDGMENT**

**(First Request)**

As further detailed hereinafter, Defendant CONSUMER OPINION LLC (“Defendant Consumer Opinion”) filed a Second Special Motion to Dismiss Plaintiff ABBEY DENTAL CENTER, INC. (“Plaintiff Abbey Dental”)’s First Amended Complaint (ECF No. 28) in this matter on or about December 9, 2016. (ECF Nos. 30, 31). The Parties, by and through their respective, undersigned counsel, do hereby stipulate and agree as follows:

1. On October 27, 2015, Plaintiff Abbey Dental filed its Complaint against Defendant Consumer Opinion. (ECF No. 1).

2. On January 6, 2016, Defendant Consumer Opinion informed Plaintiff Abbey Dental that it would be seeking a dismissal via an Anti-SLAPP motion in this case. (ECF No. 31-2).

3. After eight stipulations to extend time, Defendant Consumer Opinion filed its Special Motion to Dismiss Pursuant to NRS 41.660 and Motion for Summary Judgment on December 7, 2016. (ECF Nos. 25 & 27).

4. Plaintiff Abbey Dental responded to Defendant's Motion the next day by filing its First Amended Complaint. (ECF No. 28).

5. On December 9, 2016, Defendant Consumer Opinion responded to Plaintiff's First Amended Complaint by filing its Second Special Motion to Dismiss Pursuant to NRS 41.660 and Motion for Summary Judgment. (ECF Nos. 30 & 31).

6. Since Defendant's Second Anti-SLAPP Motion was filed, the Parties have been in cordial discussions regarding possible discovery that the Plaintiff may wish for prior to responding to the pending Anti-SLAPP Motion.

7. The Parties are desirous of relieving the Court of the necessity of contemplating their rights under NRS 41.660(4) or Fed. R. Civ. P. 56(d), and believe that they can resolve the issue informally.

8. However, in order to do so, Plaintiff Abbey Dental wishes to provide Defendant Consumer Opinion with its proposed discovery requests. Upon receiving them, the Parties will meet and confer as to the propriety of the requests.

9. Plaintiff Abbey Dental requires approximately one week in which to produce the discovery requests to Defendant Consumer Opinion, and the Parties expect to spend a few days meeting and conferring on the limitation of the requests.

10. Accordingly, the Parties jointly stipulate to an extension of the current response date to the Anti-SLAPP Motion by 30 days; Plaintiff Abbey Dental's deadline to respond to Defendant Consumer Opinion's Second Special Motion to Dismiss Pursuant to NRS 41.660 and

Motion for Summary Judgment (ECF Nos. 30 & 31) is extended from December 30, 2016 to January 29, 2017.

11. The Parties also stipulate that there is good cause for Plaintiff, Abbey Dental, to seek discovery from third parties immediately.

12. This is the first stipulation for an extension of time for Plaintiff Abbey Dental to respond to Defendant Consumer Opinion's Second Special Motion to Dismiss Pursuant to NRS 41.660 and Motion for Summary Judgment (ECF Nos. 30 & 31).

13. This extension will either permit the Parties to solve any discovery issues on their own, without the need for Court intervention, or it will allow the Parties to significantly narrow the issues so that any Court intervention is more limited in nature.

Dated this 15<sup>th</sup> day of December, 2016.

RANDAZZA LEGAL GROUP, PLLC

/s/ Marc J. Randazza

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Abbey Dental Center, Inc.*

**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE

Dated: December 21, 2016